

FILED

Mar 28 2025

Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

PATRICK D. ROBBINS (CABN 152288)
 Acting United States Attorney
 PAMELA T. JOHANN (CABN 145558)
 Chief, Civil Division
 AUDREY PAK (CABN 299991)
 Assistant United States Attorney

450 Golden Gate Avenue, 9th Floor
 San Francisco, CA 94102-3495
 Telephone: (415) 436-6838
 FAX: (415) 436-6748
 Audrey.Pak@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA *ex rel.*
 TAXPAYERS AGAINST FRAUD LLC,

Plaintiff,

v.

HUMANGOOD NORCAL CORP, et al.,

Defendants.

Civil Action No. 24-cv-6344-AGT

**THE UNITED STATES OF AMERICA'S
 NOTICE OF CONSENT TO DISMISSAL;
 [PROPOSED] ORDER**

FILED UNDER SEAL

On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is

1 commensurate with the public interest and that the matter does not warrant the continued expenditure of
2 government resources to pursue or monitor the action based on currently available information.

3 Relator's notice of voluntary dismissal contains a request that all papers and filings in this matter
4 remain under seal. The United States objects to Relator's request to keep this case under seal, on the
5 ground that the False Claims Act qui tam seal is only for the period of time that the government needs to
6 investigate a relator's allegations and make a determination whether to intervene in the case. See 31
7 U.S.C. § 3730(b)(2)-(4). The United States therefore requests that all papers on file in this action,
8 including Relator's Complaint, the Summons (if any), the Case Management Order, Relator's Notice of
9 Dismissal, this Notice, and the attached Proposed Order, be unsealed, and that the seal be lifted as to all
10 matters subsequently occurring in this action.

11 A proposed order accompanies this notice.

12
13 DATED: March 27, 2025

Respectfully submitted,

14
15 PATRICK D. ROBBINS
Acting United States Attorney

16 /s/ Audrey Pak

17 AUDREY PAK
Assistant United States Attorney
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA *ex rel.*
TAXPAYERS AGAINST FRAUD LLC,

Plaintiff,

v.

HUMANGOOD NORCAL CORP, et al.,

Defendants.

Civil Action No. 24-cv-6344-AGT

FILED UNDER SEAL

[PROPOSED] ORDER

The Relator, Taxpayers Against Fraud LLC, having filed a Notice of Voluntary Dismissal of this action without prejudice, and the United States having filed its Notice of Consent to Dismissal, pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), IT IS HEREBY ORDERED THAT:

1. this action is dismissed without prejudice;
2. all papers on file in this action be unsealed; and
3. the seal be lifted as to all other matters occurring in this action after the date of this order.

This ____ day of _____, 2025.

HON. ALEX G. TSE
United States Magistrate Judge